

1 Troy L. Isaacson, Esq., NV Bar No. 6690
2 MADDOX ISAACSON & CISNEROS, LLP
3 11920 Southern Highlands Parkway, Suite 100
4 Las Vegas, Nevada 89141
Telephone: (702) 366-1900
Facsimile: (702) 366-1999

5 Ryan L. Isenberg
6 Georgia Bar No. 384899
Isenberg & Hewitt, P.C.
7 6600 Peachtree Dunwoody Road
600 Embassy Row, Suite 150
Atlanta, Georgia 30328
8 770-351-4400 (Voice)
770-828-0100 (Fax)
ryan@isenberg-hewitt.com

10 Attorneys for Custodian

11 Shane W. Clayton, NV Bar No. 8783
12 Durham Jones & Pinegar
13 111 South Main Street, Suite 2400
Salt Lake City, UT 84111
14 801-415-3000 (Voice)
801-435-3500 (Fax)
sclayton@djplaw.com

15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

18 JOHN SOUZA

CIVIL ACTION FILE

19 PETITIONER,

NO. 2:17-cv-01924

21 V.

**MOTION TO CONTINUE
JOINT STATUS REPORT**

22 ELEVATE, INC.

23 RESPONDENT.

24 AND

25 KELEIONALANI TAYLOR

26 NON-PARTY

1 COMES NOW, John Souza ("Custodian") and files this Motion to Continue the Filing of
2 a Joint Status Report and shows this Court as follows:

3 1. The Court, disappointed in the parties' joint status report (Doc. 56) entered an Order requiring
4 another whack at it, and that it should be filed by Friday, July 26 (Doc. 57).

5 2. The undersigned prepared a proposed joint status report directly answering the Court's
6 question to Souza, but learned that counsel for Taylor is out of town and will not return to the
7 office until next week. And, Mr. Clayton's colleague who has been working on the case, but is
8 not licensed in Nevada, is out as his wife is in labor. Accordingly, I am unable to obtain Taylor's
9 input to the Joint Status Report and move for a continuance to file the joint status report through
and including Friday, August 2.

10 Wherefore, Custodian moves for an order allowing the joint status report to be filed no later than
11 Friday, August 2.

12 Dated this 25th day of July, 2019.

13 /s/ Ryan Isenberg
14 Ryan L. Isenberg
15 Attorney for Custodian

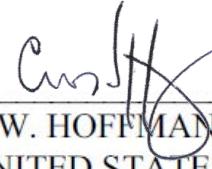
Certificate of Service

16 This is to certify that I have this day filed the within and foregoing Motion to Continue
17 the Joint Status Report upon counsel for the Non-Party Keleionalani Taylor by filing the same
18 using the Court's CM\ECF system, which will generate notice counsel of record.

19 /s/ Ryan Isenberg

20
21 IT IS SO ORDERED.

22 DATED: Jul 26, 2019

23
24
25
26
27
28 
C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE